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December 14, 2021

VIA ECF

Honorable Jessica S. Allen, U.S.M.J.
United States District Court
District of New Jersey
Martin Luther King, Jr. Federal Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: *Krishanthi, et al. v. Rajaratnam, et al.*
Civil Action No. 09-05395 (BRM)(JSA)

Dear Judge Allen:

The parties jointly submit this letter regarding ECF Nos. 479-483, in which the parties sought the Court's intervention to resolve a dispute regarding a potential extension of the expert-discovery time period. The parties have undertaken additional discussions and made progress towards resolving some of the issues identified in those letters, including that the parties are now in agreement to extend the December 19, 2021 deadline for conclusion of expert discovery. The parties have exchanged dates for conducting the depositions of the experts in this case. While the parties are not in full agreement on all issues, many of these issues are likely to be resolved in short order.

As a result of these discussions, we respectfully request that the Court not take action on those submissions at this time. The parties shall continue to meet and confer in an effort to narrow any remaining issues as much as possible and anticipate submitting a proposed consent order in the coming days. We will identify to the court at that time any remaining issues as to which we have been unable to reach resolution.

We thank the Court for its attention to this matter and remain available if the Court has any questions or would like any additional information.

Respectfully submitted,

s/Anne M. Collart

Anne M. Collart

cc: All Counsel of Record (via ECF)
Marjorie E. Berman, Esq. (via Email)